EXHIBIT E6

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3	RICARDO RIMONDI and PILAR RIMONDI,		5	Examination	by Mr. Ewald	7
5	Plaintiffs,)) DOCKET NO.	6	Examination	by Mr. Horn	127
6	vs. BASF CATALYSTS LLC, et al.,	MID-L-2912-17	7			
7	Defendants.	,	8			
8)	9			
9 10	JOANNA RUMAN and JACENTY RUMAN,) }	10			
11	Plaintiffs,) DOCKET NO.	11			
12	VS.)) MID-L-2919-17	12			
13	BASF CATALYSTS LLC, et al., Defendants.	}	13			
14		5	14			
15 16	DEPOSITIO	N OF	15			
17	WILLIAM E. LO	NGO, PhD	16 17			
18	January 7,		18			
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2			1		INDEX TO EXP	HIBITS
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25	Atlanta Reporters, Inc.	www.atlanta-reporters.com		Atlanta Reporte	rs, Inc.	www.atlanta-reporter.com

1 nonsensical definition to be asbestiform. So we know 14:10:12 1 MR. EWALD: Promise to not spend too much 14:07:07 2 the bundles are asbestiform, we have sources for 2 time on 22262-1 today, but I have just a couple 14:07:10 14:10:14 3 3 that. of questions. So as Exhibit 9, we're going to 14:10:18 14:07:14 Now we're dealing with the single fibers. 4 mark ISO 22262-1. 14:07:15 14:10:35 5 I don't believe it's reasonable to say 10 percent of 5 (Defendant's Exhibit 9 was marked for 14:10:43 14:07:20 6 the single fibers from these mine sources are unknown 6 identification.) 14:10:55 14.07.24 when you have all these other bundles. I don't think 7 (By Mr. Ewald) Doctor, this ISO 22262-1 7 14:10:55 14:07:28 it's reasonable to say that the average aspect ratio 8 is one of the methods you used in connection with 8 9 from ground talc on tremolite that we find in these 9 your November 14th, 2018, report; is that correct? 14:11:02 14:07:36 10 samples are the same as what Blount found as well as 14:11:08 That is correct. 14:07:40 14:07:44 11 Campbell found as well as Langer found, saving these You've been asked for --14-11-21 11 Q. are all asbestiform with that aspect ratio. So 14:11:25 12 2.8? 14:07:49 12 A. 14:07:54 13 that's my opinion, that these are asbestiform. 14:11:26 13 Q. -- about 2.8. I'm not going to go back 14:07:57 14 Okay. So if I asked you in 2016 what your there, at least immediately. 14-11-29 14 14:08:03 15 definition of asbestiform was, what would you have 14:11:31 15 Am I correct that you referred to 2.8 on 14:08:05 16 14:11:36 16 page 2, definition of asbestiform as, quote, a 14:08:07 17 14:11:43 17 general definition; is that right? MR. HORN: Object to form. Vague and 14:08:11 18 ambiguous. 14:11:44 18 That's correct. 14:08:11 19 THE WITNESS: I don't know. 14:11:46 19 Q. Okay. Let's go to page 23, and that is 14:08:12 20 (By Mr. Ewald) If you have used the word 14:11:53 20 carryover of 7.2.3.7.1, morphology. Let me know when 14:08:17 **21** 14:11:59 21 asbestiform in prior transcripts before talc you get to 23. 14:08:20 **22** litigation -- I'll withdraw that. 14:12:03 **22** A. I have it. 14:08:24 23 14:12:04 23 The definition you gave today of Okay. Do you agree with me that ISO 14:08:29 24 asbestiform, is that the definition that you have 14:12:18 24 22262-1 distinguishes in this section between 14:08:32 **25** 14:12:26 25 used the entire time that you have been testifying in asbestiform amphibole fibers and nonasbestiform Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com 1 cosmetic talc litigation? 1 amphibole fibers? 14:08:37 14:12:30 2 A. I think what I've stated in the past is 14-12-43 2 MR. HORN: Can I have that question read 3 3 that for single fibers you can't tell if it's back? I was actually reading the protocol. 14:08:43 14:12:46 asbestiform or not based on the definition. But 4 4 14:13:09 (Record was read by the court reporter.) 14:08:48 5 we're not looking just at a single fiber. We're 5 MR. HORN: Thank you. 14:13:09 14:08:53 6 6 looking at multiple fibers and bundles. 14:13:09 THE WITNESS: Yes. This is intended as 14:08:55 7 7 So you have the geological definition of guidance for analysts to discriminate -- from 14:08:58 8 asbestiform, and then you just have is it fibrous, 14:13:15 8 the note on page 23 -- between nonasbestiform 14:09:02 9 therefore it's asbestiform. 9 and asbestiform amphibole populations. It is 14:13:23 14:09:06 10 Under the if it's fibrous, therefore it's 14:13:27 10 not intended to override the definition of 14:00:07 14:09:12 11 asbestiform version, in your view you can determine 14:13:29 11 asbestos as presented in 2.9 nor override any 14:13:33 12 14:09:18 12 that a single fiber is asbestiform; is that your national regulation. 14:09:21 13 view? 14:13:35 13 So according to that, it is guidance to 14:09:21 14 A single fiber in one sample, yes, if it's 14:13:38 14 the analyst. 14:09:25 15 fibrous, it's asbestiform. It does not meet the 14:13:41 15 (By Mr. Ewald) Okay. You can keep that definition of a geological grab sample because the 14:09:27 16 14:14:02 16 close by. We'll come back to it maybe. 14:09:31 17 definition of asbestiform provides you all these 14:14:05 17 I want to talk a little bit about Mr. Poye. 14:09:34 18 different tests that are not applicable and don't 14:14:17 18 14:14:17 19 14:09:37 19 give you any measurement ability to measure high Sure. A. 14:09:42 20 tensile strength. Don't even tell you what high 14:14:25 20 MR. EWALD: Let's mark this as Exhibit 10. 14:09:45 **21** tensile strength is. You can't measure flexibility. 21 (Defendant's Exhibit 10 was marked for 14:14:43 22 14:09:47 22 You can't measure -- you can't measure any of that identification.) 14:09:53 23 with any of the protocols. And these are fibers that 14:14:43 23 (By Mr. Ewald) Doctor, as Exhibit 10, 14:09:59 24 are regulated asbestos fibers. My definition is 14:14:52 24 handing you what is -- it's got a couple pages at the 14:10:03 25 14:14:58 25 they're all asbestiform. Others can argue with that. beginning. Can you describe what those first couple Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com

	se 3:16	-md-02738-MAS-RLS Document 974	2-12	Fil	ed 05/07/19 Page 4 of 8 PageID: 47508
14:15:01 1	pages are		14:18:36	1	used with respect to PLM, and I would like you to
14:15:01 2	Α.	The chain of custodies for the samples we	14:18:41	2	turn to
14:15:07 3	sent hin	. I think there's 50 79. These are the	14:18:42	3	A. Used the ISO method.
14:15:22 4		custodies for the 79 samples we sent him.	14:18:44	4	Q. Okay. It's your understanding that he
14:15:25 5		he chain of custody is the key because we	14:18:46	5	used the ISO 22262-1 method?
14:15:28 6		m as blind, meaning we generated a number	14:18:54	6	A. Correct. And the confusion came in where
14:15:32 7		through 79, and then the corresponding MDL		7	the original XRD samples I sent him for those 30
14:15:40		that we have. And then on the back on	14:18:59	8	samples, I believe that was the R-93 method. I just
14:15:50 9	another	page has his numbers, then the actual MDL	14:19:01	9	got them mixed up in my head. I could have just
14:15:55 10		that were sent.	14:19:03	10	looked at the document and stated it correctly.
14:16:07 11	Q.	Am I correct after that you have	14:19:15	11	Q. Do you have an understanding as to why J3
14:16:12 12	Mr. Poye	s July 18th, 2018, report to you on the MAS	14:19:25		used ISO 22262-1 as opposed to R-93 for the PLM work?
14:16:17 13	-	storic talc samples?	14:19:31		A I'll have to let Lee Poye speak to that.
14:16:20 14	Α.	Correct.	14:19:36		It looks like to me just standardizing the protocol
14:16:21 15	Q.	And have you seen this before?	14:19:39		since there is both an ISO PLM for talc as well as an
14:16:23 16	A.	Of course.	14:19:43	16	ISO TEM for talc.
14:16:26 17	Q.	Just making sure.	14:19:48	17	Q. So I asked Lee Poye that.
14:16:29 18		Now, when was the last time you spoke to	14:19:50		A. What did he say?
14:16:39 19	Mr. Poye	about the testing reflected in his	14:19:52	19	Q. Mr. Poye said that his recollection is
14:16:46 20	July 18th	, 2018, report?	14:19:54	20	that you told him to use ISO 22262-1. Do you have
14:16:48 21	, A.	Some months. I don't remember the last	14:19:59	21	any recollection of that?
14:16:50 22	time I ta	ilked to him about it.	14:20:00	22	A. It's possible. I just don't recall that.
14:16:52 23	Q.	Do you recall whether or not it was before	14:20:03	23	Q. Do you see on it's the cover letter to
14:16:57 24	or after h	e sent you this work?	14:20:08	24	the report on top of page 2, at the top, first full
14:17:03 25	A.	No, I don't recall.	14:20:18	25	sentence, J3 was directed to analyze the talcum
	Atlanta Re	porters, Inc. 866-344-0459 www.atlanta-reporters.com			Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com
		86			88
14:17:05	Q.	What do you recall about that	14:20:21	1	powder samples for the presence and percentage of
14:17:08 2					, , , , , , , , , , , , , , , , , , , ,
	commun	cation?	14:20:24	2	regulated asbestos utilizing the following
14:17:09 3	communi A.	cation? I don't recall any of it.		2 3	
14:17:09 3 14:17:11 4	-		14:20:24	_	regulated asbestos utilizing the following
_	Α.	I don't recall any of it.	14:20:24 14:20:27	3	regulated asbestos utilizing the following appropriate methods, and one of the methods there
14:17:11 4	A. Q. A.	I don't recall any of it. Was it by phone? In person? Email?	14:20:24 14:20:27 14:20:30	3	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that?
14:17:11 4 14:17:14 5	A. Q. A. know I t	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I	14:20:24 14:20:27 14:20:30 14:20:38	3 4 5	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's
14:17:11 4 14:17:14 5 14:17:19 6	A. Q. A. know I t I talked	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I salked to him about sending the samples. Have	14:20:24 14:20:27 14:20:30 14:20:38 14:20:43	3 4 5 6	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's recollection, I have no reason to dispute that.
14:17:11 4 14:17:14 5 14:17:19 6 14:17:22 7	A. Q. A. know I t I talked	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I alked to him about sending the samples. Have to him about the results or not, I don't	14:20:24 14:20:27 14:20:30 14:20:38 14:20:43 14:20:45	3 4 5 6 7	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's recollection, I have no reason to dispute that. Q. I take it, then, you have not reviewed
14:17:11 4 14:17:14 5 14:17:19 6 14:17:22 7 14:17:24 8	A. Q. A. know I t I talked have an Q.	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I salked to him about sending the samples. Have to him about the results or not, I don't y recollection of that.	14:20:24 14:20:27 14:20:30 14:20:38 14:20:43 14:20:45 14:20:48	3 4 5 6 7 8 9	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's recollection, I have no reason to dispute that. Q. I take it, then, you have not reviewed Mr. Poye's deposition in the Lovett case relating to
14:17:11	A. Q. A. know I t I talked have an Q. than Mr.	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I salked to him about sending the samples. Have to him about the results or not, I don't y recollection of that. Have you communicated with anyone other Poye at his lab, J3, about the testing that ed in his July 18th report?	14:20:24 14:20:27 14:20:30 14:20:38 14:20:45 14:20:45 14:20:52 14:20:56	3 4 5 6 7 8 9 10	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's recollection, I have no reason to dispute that. Q. I take it, then, you have not reviewed Mr. Poye's deposition in the Lovett case relating to testing of the samples reflected in the July 18th report? A. I have not.
14:17:11	A. Q. A. know I t I talked have an Q. than Mr.	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I salked to him about sending the samples. Have to him about the results or not, I don't y recollection of that. Have you communicated with anyone other Poye at his lab, J3, about the testing that ed in his July 18th report? Not that I recall.	14:20:24 14:20:27 14:20:30 14:20:38 14:20:43 14:20:48 14:20:48 14:20:56 14:20:56 14:20:56	3 4 5 6 7 8 9 10	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's recollection, I have no reason to dispute that. Q. I take it, then, you have not reviewed Mr. Poye's deposition in the Lovett case relating to testing of the samples reflected in the July 18th report? A. I have not. Q. Do you have any knowledge about J3's
14:17:11 4 14:17:14 5 14:17:19 6 14:17:22 7 14:17:24 8 14:17:26 9 14:17:32 10 14:17:39 11 14:17:42 12 14:17:45 13	A. Q. A. know I to I talked have an Q. than Mr. is reflected	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I salked to him about sending the samples. Have to him about the results or not, I don't y recollection of that. Have you communicated with anyone other Poye at his lab, J3, about the testing that ed in his July 18th report?	14:20:24 14:20:27 14:20:30 14:20:38 14:20:45 14:20:45 14:20:52 14:20:56 14:21:13 14:21:13	3 4 5 6 7 8 9 10 11	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's recollection, I have no reason to dispute that. Q. I take it, then, you have not reviewed Mr. Poye's deposition in the Lovett case relating to testing of the samples reflected in the July 18th report? A. I have not. Q. Do you have any knowledge about J3's testing of the MDL samples beyond what is reflected
14:17:11 4 14:17:14 5 14:17:19 6 14:17:22 7 14:17:24 8 14:17:26 9 14:17:32 10 14:17:39 11 14:17:42 12 14:17:45 13 14:17:54 14	A. Q. A. know I t I talked have an Q. than Mr. is reflected	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I calked to him about sending the samples. Have to him about the results or not, I don't y recollection of that. Have you communicated with anyone other Poye at his lab, J3, about the testing that ed in his July 18th report? Not that I recall. There was some confusion, I believe,	14:20:24 14:20:27 14:20:30 14:20:38 14:20:45 14:20:45 14:20:56 14:20:56 14:20:56 14:21:13 14:21:20	3 4 5 6 7 8 9 10 11 12	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's recollection, I have no reason to dispute that. Q. I take it, then, you have not reviewed Mr. Poye's deposition in the Lovett case relating to testing of the samples reflected in the July 18th report? A. I have not. Q. Do you have any knowledge about J3's testing of the MDL samples beyond what is reflected in this July 18, 2018, report?
14:17:11	A. Q. A. know I t I talked have an Q. than Mr. is reflecte A. Q. during A.	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I salked to him about sending the samples. Have to him about the results or not, I don't y recollection of that. Have you communicated with anyone other Poye at his lab, J3, about the testing that ed in his July 18th report? Not that I recall. There was some confusion, I believe, Chain of custody of the spike samples?	14:20:24 14:20:27 14:20:30 14:20:38 14:20:43 14:20:48 14:20:48 14:20:56 14:20:56 14:21:13 14:21:20 14:21:28	3 4 5 6 7 8 9 110 111 112 113	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's recollection, I have no reason to dispute that. Q. I take it, then, you have not reviewed Mr. Poye's deposition in the Lovett case relating to testing of the samples reflected in the July 18th report? A. I have not. Q. Do you have any knowledge about J3's testing of the MDL samples beyond what is reflected in this July 18, 2018, report? A. I don't think so.
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14:17:11	A. Q. A. know I t I talked have an Q. than Mr. is reflecte A. Q. during A. Q. but	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I calked to him about sending the samples. Have to him about the results or not, I don't y recollection of that. Have you communicated with anyone other Poye at his lab, J3, about the testing that ed in his July 18th report? Not that I recall. There was some confusion, I believe, Chain of custody of the spike samples? Actually, that wasn't where I was going	14:20:24 14:20:27 14:20:30 14:20:38 14:20:45 14:20:45 14:20:56 14:20:56 14:21:13 14:21:20 14:21:28 14:21:28 14:21:41 14:21:41	3 4 5 6 7 8 9 10 11 12 13 14 15 16	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's recollection, I have no reason to dispute that. Q. I take it, then, you have not reviewed Mr. Poye's deposition in the Lovett case relating to testing of the samples reflected in the July 18th report? A. I have not. Q. Do you have any knowledge about J3's testing of the MDL samples beyond what is reflected in this July 18, 2018, report? A. I don't think so. Q. Let me toggle between a couple of reports now. I'll keep the Lee Poye one close by, but if
14:17:11 4 14:17:14 5 14:17:19 6 14:17:22 7 14:17:24 8 14:17:26 9 14:17:32 10 14:17:39 11 14:17:42 12 14:17:45 13 14:17:55 15 14:18:06 17 14:18:06 18	A. Q. A. know I t I talked have an Q. than Mr. is reflecte A. Q. during A. Q. but A.	I don't recall any of it. Was it by phone? In person? Email? I'm sure it would have been by phone. I salked to him about sending the samples. Have to him about the results or not, I don't y recollection of that. Have you communicated with anyone other Poye at his lab, J3, about the testing that ed in his July 18th report? Not that I recall. There was some confusion, I believe, Chain of custody of the spike samples? Actually, that wasn't where I was going Everybody seems to have confusion on that,	14:20:24 14:20:27 14:20:30 14:20:38 14:20:43 14:20:45 14:20:48 14:20:56 14:20:56 14:21:13 14:21:20 14:21:28 14:21:41 14:21:46 14:21:49	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	regulated asbestos utilizing the following appropriate methods, and one of the methods there that's listed is ISO 22262-1; do you see that? A. I do see that. Now, if that's Mr. Poye's recollection, I have no reason to dispute that. Q. I take it, then, you have not reviewed Mr. Poye's deposition in the Lovett case relating to testing of the samples reflected in the July 18th report? A. I have not. Q. Do you have any knowledge about J3's testing of the MDL samples beyond what is reflected in this July 18, 2018, report? A. I don't think so. Q. Let me toggle between a couple of reports now. I'll keep the Lee Poye one close by, but if you'll look at your November report, on page 16
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14:22:48	XRD.	14:26:27 1	now, and can set that aside.
14:22:52 2	Q. And then, at least as of the time of this	14:26:34 2	Going back to your November report, what
_	report, this report being the November 14th report,		role did Dr. Rigler play in this report?
_		_	
-	J3 and MAS had analyzed 22 of same samples by ISO PLM	_	•
14:23:27 5	that MAS had; is that correct?	14:26:48 5	he was one of the QC people.
7	A. That's correct.	14:27:18 6	Q. Why did you ask J3 to perform the ISO PLM
14:23:29 7	Q. And the statement here at the bottom that	14:27:25 7	on the same samples that MAS was testing with ISO
14:23:35	J3 did not find any asbestos detected in those 22	14:27:30 8	PLM?
14:23:42 9	samples, while MAS found asbestos in eight of the 22	14:27:30 9	MR. HORN: Object to form.
14:23:47 10	samples using the ISO PLM method, is that the correct	14:27:33 10	THE WITNESS: They had initially done a
14:23:51 11	statement?	14:27:37 11	number of the ISO PLM. We had sent off the
14:23:52 12	A. That is a correct statement.	14:27:41 12	samples for the original 30 and, just to be
14:23:53 13	Q. And then it goes on to state, These	14:27:43 13	consistent, wanted to see the difference between
14:23:56 14	different results between the two labs will require	14:27:47 14	the two labs that used that method. And of
14:23:59 15	further investigation to understand the reason for	14:27:54 15	course the XRD, we don't have an XRD. So it
14:24:01 16	these differences.	14:28:00 16	just was interesting to me.
14:24:02 17	Did I read that correctly?	14:28:01 17	Q. (By Mr. Ewald) Trying to get a sense of,
14:24:04 18	A. You did.	14:28:36 18	essentially, the workflow for the November 14th
14:24:04 19	Q. As of day 3 of Leavitt, I think this was	14:28:39 19	testing with respect to the testing reflected in
14:24:09 20	asked maybe it was day two	14:28:45 20	the November 14th report at MAS, and there are a
14:24:12 21	A. Or day one	14:28:50 21	number of different test methods that are described
14:24:14 22	Q. There had not been any steps taken at that	14:28:52 22	there that MAS conducted. Do you have a sense of how
14:24:17 23	point in time on this question of investigating the	14:28:56 23	that played out, whether it was all done in the same
14:24:19 24	different results. Have there since been any efforts	14:28:59 24	order with respect to a particular sample? Can you
14:24:24 25	by MAS or efforts you're aware of from J3 to	14:29:03 25	give some explanation of that?
	Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com		Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com
	90		92
14:24:28 1	90 investigate the different results reached on those 22	14:29:05 1	92 A. When you say a particular order
14:24:28 1 14:24:32 2	investigate the different results reached on those 22 PLM samples?	14:29:05 1 14:29:07 2	
	investigate the different results reached on those 22		A. When you say a particular order
14:24:32 2	investigate the different results reached on those 22 PLM samples?	14:29:07 2	A. When you say a particular orderQ. So, for example, you have one of the 56
14:24:32 2 14:24:32 3	investigate the different results reached on those 22 PLM samples? A. We haven't done anything further. May	14:29:07 2 14:29:15 3	A. When you say a particular order Q. So, for example, you have one of the 56 samples there that MAS tested by ISO PLM, Blount PLM,
14:24:32 2 14:24:32 3 14:24:36 4	investigate the different results reached on those 22 PLM samples? A. We haven't done anything further. May develop some standards at the lower detection limit	14:29:07 2 14:29:15 3 14:29:23 4	 A. When you say a particular order Q. So, for example, you have one of the 56 samples there that MAS tested by ISO PLM, Blount PLM, and TEM; right? A. Correct. Q. For each sample was the analysis done in a
14:24:32 2 14:24:32 3 14:24:36 4 14:24:39 5	investigate the different results reached on those 22 PLM samples? A. We haven't done anything further. May develop some standards at the lower detection limit and have a blind round-robin between the two analysts to see how consistent they are. But other than that, I don't have any	14:29:07 2 14:29:15 3 14:29:23 4 14:29:26 5	 A. When you say a particular order Q. So, for example, you have one of the 56 samples there that MAS tested by ISO PLM, Blount PLM, and TEM; right? A. Correct.
14:24:32 2 14:24:32 3 14:24:36 4 14:24:39 5 14:24:43 6 14:24:45 7 14:24:48 8	investigate the different results reached on those 22 PLM samples? A. We haven't done anything further. May develop some standards at the lower detection limit and have a blind round-robin between the two analysts to see how consistent they are.	14:29:07 2 14:29:15 3 14:29:23 4 14:29:26 5 14:29:27 6 14:29:32 7 14:29:38 8	 A. When you say a particular order Q. So, for example, you have one of the 56 samples there that MAS tested by ISO PLM, Blount PLM, and TEM; right? A. Correct. Q. For each sample was the analysis done in a
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14:24:32	investigate the different results reached on those 22 PLM samples? A. We haven't done anything further. May develop some standards at the lower detection limit and have a blind round-robin between the two analysts to see how consistent they are. But other than that, I don't have any other information that I can share for the reason for the eight positives versus the eight negatives by J3. Q. So as you sit here today, do you have any	14:29:07 2 14:29:15 3 14:29:23 4 14:29:26 5 14:29:27 6 14:29:32 7 14:29:38 8 14:29:43 9 14:29:45 10	A. When you say a particular order Q. So, for example, you have one of the 56 samples there that MAS tested by ISO PLM, Blount PLM, and TEM; right? A. Correct. Q. For each sample was the analysis done in a particular order with respect to the type of testing, or was it just done in whatever order it happened? A. Well, there's two different groups that are doing the testing, so you have the PLM group and
14:24:32 2 14:24:32 3 14:24:36 4 14:24:39 5 14:24:43 6 14:24:45 7 14:24:48 8 14:24:52 9 14:24:57 10 14:25:01 11	investigate the different results reached on those 22 PLM samples? A. We haven't done anything further. May develop some standards at the lower detection limit and have a blind round-robin between the two analysts to see how consistent they are. But other than that, I don't have any other information that I can share for the reason for the eight positives versus the eight negatives by J3. Q. So as you sit here today, do you have any basis to understand why two labs using the same	14:29:07 2 14:29:15 3 14:29:23 4 14:29:26 5 14:29:27 6 14:29:32 7 14:29:38 8 14:29:43 9 14:29:45 10 14:29:50 11	A. When you say a particular order Q. So, for example, you have one of the 56 samples there that MAS tested by ISO PLM, Blount PLM, and TEM; right? A. Correct. Q. For each sample was the analysis done in a particular order with respect to the type of testing, or was it just done in whatever order it happened? A. Well, there's two different groups that are doing the testing, so you have the PLM group and then the TEM group. Typically we don't we're not
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	SC 3:16-MG-02736-MAS-RES - D0Cument 974 2 93	-12 11	led 05/07/19 Page 6 of 8 PageID: 47510
14:30:47	present.	14:34:12 1	I'm assuming McCrone is the ones that developed a
14:30:47	There's four TEM analysts. Whatever they	14:34:15 2	method that was adopted by Johnson & Johnson.
14:30:50 3	seem to be working on, some will take samples say	14:34:23 3	Outside of that, I really don't have a
14:30:54	we have 22 samples. Some may be working from 22 on	14:34:25 4	sense on what other commercial laboratories have done
14:30:59 5	down, some may be grabbing in the middle. It's just	14:34:27 5	for clients.
•	whoever's free and what's available, what's been	14:34:28 6	Q. And you don't hold the opinion that the
7	prepared. At the end of the day then we're just	7	McCrone and Millette method was designed as a rigged
14:31:05 /	trying to put them all together. However, I'll give	14:34:31 / 14:34:37 8	test, do you?
14:31:10 8	you credit now trying to get the PLM analysts to get	14:34:37 9	A. As a what?
14:31:19 10	ahead of the TEM guys.	14:34:37 3	Q. As a rigged test.
14:31:19 10		14:34:38 10	A. I don't know what rigged means. I don't
14:31:25 12		14:34:39	
14:31:33 13	in any way about his not his about ISO 22262-1?	14:35:12 12	know what McCrone was thinking.
14:31:33 13	A. Well, to give Dr Eric credit, it's	14:35:17 13	Only issue I have with all those methods
	basically his.		is that there seems to be a lack of understanding on
14:31:38 15	Q. The answer to my question is yes or no?	14:35:22 15	just how much asbestos regulated asbestos meeting
14:31:40 16	A. No, I have not talked to Eric. I haven't	14:35:29 16	definitions has to be in the sample before you call
14:31:43 17	seen him in a while. He is a world of knowledge.	14:35:32 17	it a positive sample.
14:31:51 18	Q. Do you agree that it's common for	14:35:35 18	And as I've progressed through this work,
14:31:57 19	independent labs to design standard operating	14:35:37 19	the weight percents and that's the other problem I
14:32:00 20	procedures for companies analyzing asbestos in their	14:35:41 20	have, is the theoretical weight percent detection
14:32:03 21	products?	14:35:47 21	limits.
14:32:05 22	A. Is it standard operating procedure	14:35:48 22	Where the disconnect on that is our
14:32:10 23	MR. HORN: Let me just object to form.	14:35:52 23	detection limit is based on one small fiber, and it's
14:32:12 24	It's vague and ambiguous.	14:35:58 24	like looking at the FDA 2010 data from AMA, and I
14:32:13 25	THE WITNESS: And I'm just trying to	14:36:04 25	think they gave a detection limit of 2.0 times 10 to
	Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com		Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com
	94		96
14:32:15 1	clarify, so that if a company comes and says	14:36:09	the minus 6 weight percent because they're detecting
14:32:17 2	develop a protocol for me, I mean, we've done		one fiber. Well, you have to understand in order to
		14:36:13 2	one liber. Well, you have to understand in order to
14:32:20 3	that once. We did it for Federal-Mogul for when	14:36:13 2 14:36:16 3	detect that one fiber for the TEM method that AMA was
14:32:20 3 14:32:24 4	that once. We did it for Federal-Mogul for when they came into an accessory mineral tremolite		detect that one fiber for the TEM method that AMA was looking at, you have to have something like 12
1		14:36:16 3	detect that one fiber for the TEM method that AMA was
14:32:24 4	they came into an accessory mineral tremolite	14:36:16 3 14:36:20 4	detect that one fiber for the TEM method that AMA was looking at, you have to have something like 12
14:32:24 4 14:32:27 5	they came into an accessory mineral tremolite issue with their brake shoes.	14:36:16 3 14:36:20 4 14:36:23 5	detect that one fiber for the TEM method that AMA was looking at, you have to have something like 12 million fibers before, statistically, you may run across one fiber. So the method is the method. I'll let
14:32:24 4 14:32:27 5 14:32:35 6	they came into an accessory mineral tremolite issue with their brake shoes. So I can't speak for other labs. What I	14:36:16 3 14:36:20 4 14:36:23 5 14:36:26 6	detect that one fiber for the TEM method that AMA was looking at, you have to have something like 12 million fibers before, statistically, you may run across one fiber.
14:32:24 4 14:32:27 5 14:32:35 6 14:32:38 7 14:32:41 8 14:32:46 9	they came into an accessory mineral tremolite issue with their brake shoes. So I can't speak for other labs. What I know is that we had developed a protocol for	14:36:16 3 14:36:20 4 14:36:23 5 14:36:26 6 14:36:28 7	detect that one fiber for the TEM method that AMA was looking at, you have to have something like 12 million fibers before, statistically, you may run across one fiber. So the method is the method. I'll let
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14:32:24	they came into an accessory mineral tremolite issue with their brake shoes. So I can't speak for other labs. What I know is that we had developed a protocol for them, and I guess they if you go on Google, you can get it.	14:36:16	detect that one fiber for the TEM method that AMA was looking at, you have to have something like 12 million fibers before, statistically, you may run across one fiber. So the method is the method. I'll let others decide if it's, quote, rigged or not. But you can't use that method and say there's nothing in the
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made to cover this deposition. Atlanta Reporters juill charge its usual and customary rates to all parties in the case, and a financial discount will not be given to any party to this litigation. DEBRA R. LUTHER, B-881 Georgia Certified Court Reporter Allanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com Atlanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com DEPOSITION OF WILLIAM E. LONGO, PhD / DRL 1 do hereby certify that I have read all questions propounded to me and all answers given by me on the 7th day of January 2019, taken before Debra R. Luther, and that: 1) There are no changes noted: 1) There are no changes noted: 2) The following changes are noted: 3 Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or the Official Code of Georgia Annotated 9-11-30(e), both of which read in part: Any changes in form or substance which you desire to make shall be entered upon the depositionwith a Accordinally, to assist you in effecting corrections, please use the form below: Page No. Line No. should read:		deposition.
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This, theday of20 DEBRA R. LUTHER, B-881 Georgia Certified Court Reporter Allanta Reporters, Inc. 868-344-0459 www.atlanta-reporters.com T34 DEPOSITION OF WILLIAM E. LONGO, PhD /DRL I do hereby certify that I have read all questions propounded to me and all answers given by me on the 7th day of January 2019, taken before Debra R. Luther, and that:	0	Sworn to and subscribed before me,
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DEBRA R. LUTHER, B-881 Georgia Certified Court Reporter 23 24 25 Milanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com Allanta Reporters, Inc. 866-344-0459 www.atlanta-reporters.com DEPOSITION OF WILLIAM E. LONGO, PhD /DRL I do hereby certify that I have read all questions propounded to me and all answers given by me on the 7th day of January 2019, taken before Debra R. Luther, and that: 1) There are no changes noted. 2) The following changes are noted: Any changes in form or substance which you desire to make shall be entered upon the depositionwith a Accordingly, to assist you in effecting corrections, please use the form below: Page No. Line No. should read:	9	21
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